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Nevada State Bar No. 10357
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Attorney for Defendants/Counterclaimants
DAN RASURE
WIND PUMP POWER, LLC
SUNFLOWER WIND, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * * * *

NEVADA CONTROLS, LLC, a Nevada
Limited Liability Company,

Plaintiff,

v.

WIND PUMP POWER, LLC, a Kansas
Limited Liability Company, SUNFLOWER
WIND, LLC, a Kansas Limited Liability
Company; DAN RASURE, an individual,

Defendants.

WIND PUMP POWER, LLC, a Kansas
Limited Liability Company,

Counterclaimant,

v.

NEVADA CONTROLS, LLC, a Nevada
Limited Liability Company,

Counterdefendant.

) Case No. 3-12-cv-00068-HDM-VPC

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COMES NOW, MARK A. GOODMAN, ESQ., of GOODMAN LAW CENTER,
P.C., and pursuant to Local Rule IA 10-6 of the Local Rules of Practice for the United

1 States District Court for the District of Nevada, hereby moves the Court for an Order
2 permitting said attorney to withdraw as counsel of record for Defendant, SUNFLOWER
3 WIND, LLC, upon the ground of conflict of interest.
4

5 This Motion is made and based upon the Points and Authorities submitted
6 herewith; upon the Declaration of MARK A. GOODMAN, ESQ., attached hereto as
7 **Exhibit “A”** and made a part hereof; and upon all of the documents, papers, and pleadings
8 on file herein.
9

10 **RESPECTFULLY SUBMITTED, Friday, May 03, 2013.**

11 **GOODMAN LAW CENTER**

12 **/s/MARK A. GOODMAN, ESQ.**

13 Attorney for Defendant,
14 SUNFLOWER WIND, LLC

15 **POINTS AND AUTHORITIES**

16 Local Rule IA 10-6(b) provides:

17 “(b) No attorney may withdraw after appearing in a case except by
18 leave of court after notice served on the affected client and opposing
19 counsel.”

20 In light of the above-quoted rule, this attorney hereby seeks an Order from the
21 Court permitting his withdrawal as counsel of record for Defendant, SUNFLOWER
22 WIND, LLC (“Sunflower Wind”). A supportive Declaration is attached hereto as **Exhibit**
23 **“A”** and incorporated herein by this reference as if fully set forth herein.

24 No trial date has been assigned to this dispute, and no delay will result to any party
25 as a result of this withdrawal of counsel.
26

27 In the event this Motion is granted, the address at which Defendant, SUNFLOWER
28 WIND, LLC, may be served with notice of all further proceedings in this case is, as
follows:

1 Sunflower Wind, LLC
2 c/o David D. Swenson, Esq.
3 Swenson, Brewer & Long, Chartered
4 613 Washington Street
5 Post Office Box 549
6 Concordia, Kansas 66901-0549

7 **CONCLUSION**

8 Based upon the above-quoted rule, and based upon the attached Declaration, it is
9 respectfully requested that this Court issue an Order relieving MARK A. GOODMAN,
10 ESQ., as attorney of record for Defendant, SUNFLOWER WIND, LLC, in this case.

11 **RESPECTFULLY SUBMITTED, Friday, May 03, 2013,**

12 **GOODMAN LAW CENTER**

13 **/s/MARK A. GOODMAN, ESQ.**

14 Attorney for Defendant,
15 SUNFLOWER WIND, LLC
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an agent of GOODMAN LAW CENTER, P.C., and that I caused a true and correct copy of **MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT SUNFLOWER WIND, LLC** to be served by:

☐ (BY MAIL) on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At the Law Offices of Goodman Law Center, P.C., mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Reno, County of Washoe, Nevada.

☐ (BY PERSONAL DELIVERY) by causing a true copy thereof to be hand delivered this date to the addressee(s) at the address(es) set forth below.

☐ (BY FACSIMILE) on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) noted below.

☐ Federal Express or other overnight delivery

☐ Reno/Carson Messenger Service

addressed, as follows:

Leigh Goddard, Esq.	via this Court's ECF system
Jessica Woelfel, Esq.	
McDonald Carano Wilson LLP	
100 West Liberty Street, 10th Floor	
Post Office Box 2670	
Reno, Nevada 89505-2670	

DATED: Friday, May 03, 2013.

/s/ Paula Rodriguez

PAULA RODRIGUEZ, CLA
Legal Assistant to Mr. Goodman